

# PORTALE | RANDAZZO

March 20, 2024

**Via ECF**

Honorable Kenneth M. Karas  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10606

**Re: Andrew Krivak, Jr. v. Putnam County, et al.  
23 Civ. 6960 (KMK)**

Dear Judge Karas:

This firm represents the County of Putnam, Sheriff Robert Thoubboron, Investigators Harold Turner, Daniel Stephens, Patrick Castaldo, William Quick, John Daniel Rees, and William Asher, Putnam County District Attorneys Robert V. Tendy and Kevin Wright, and Putnam County Assistant District Attorneys Larry Glasser, Chana Krauss and Christopher York, and District Attorney Investigator Ralph Cilento (the “Putnam County Defendants”) in the above-mentioned matter. I write today, with Plaintiff’s counsel’s consent, to request an extension of time to March 29, 2024, for the Putnam County Defendants to respond to Plaintiff’s letter dated March 15, 2024 raising concerns regarding conflicts of interest in this firm’s representation of the Putnam County Defendants. The Putnam County Defendants request additional time to respond as they continue to re-evaluate the need for separate counsel.

Additionally, Defendants Putnam County District Attorneys Robert V. Tendy and Kevin Wright, and Putnam County Assistant District Attorneys Larry Glasser, Chana Krauss and Christopher York, and District Attorney Investigator Ralph Cilento (the “PCDA Defendants”) have no objection to Plaintiff filing a sur-reply in response to the PCDA Defendants’ reply memorandum in further support of their motion to dismiss Plaintiff’s Complaint that was filed on March 8, 2024.

Thank you for Your Honor’s attention and courtesy.

Respectfully submitted,



Drew W. Sumner

cc: Counsel of record via ECF.

Denise Rose  
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